

KATTEN MUCHIN ROSENMAN LLP

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*Counsel for Sears Holdings Corporation, and
its debtor affiliates, as debtors and debtors in possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

Re: Docket Index 6350

**CERTIFICATE OF NO OBJECTION REGARDING SECOND QUARTERLY REPORT
OF KATTEN MUCHIN ROSENMAN LLP, AS SPECIAL AVOIDANCE COUNSEL FOR
THE DEBTORS, FOR ALLOWANCE OF CONTINGENT FEES AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM OCTOBER 1, 2019 THROUGH DECEMBER 31, 2019**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

I, Steven J. Reisman, hereby certify that as of the date hereof, I have received no answer, objection or other responsive pleading to the *Second Quarterly Report Of Katten Muchin Rosenman LLP, Special Avoidance Counsel For The Debtors, For Allowance Of Contingent Fees And Reimbursement Of Expenses For The Period From October 1, 2019 Through December 31, 2019* (filed on January 17, 2020, at Docket No. 6350) (the “Second Quarterly Report”).

The undersigned further certifies that I have caused the Court’s docket in these cases to be reviewed and no answer, objection or other responsive pleading to the Second Quarterly Report appears thereon. Pursuant to the Notice of the Second Quarterly Report, objections to the First Quarterly Report were to be filed and served no later than February 7, 2020, at 4:00 p.m. (EST).

It is hereby respectfully requested that the proposed form of order (attached hereto as Exhibit A) approving the Second Quarterly Report be entered at the earliest convenience of the Court.

Dated: February 12, 2020

KATTEN MUCHIN ROSENMAN LLP

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